

Exhibit A

(Proposed Order)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.¹

X

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: PROMESA

: Title III

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: Case No. 17-BK-3283 (LTS)

:

: (Jointly Administered)

:

:

X

**ORDER GRANTING OMNIBUS MOTION BY THE AVOIDANCE ACTIONS
TRUSTEE TO LIFT LITIGATION STAY IN CERTAIN AVOIDANCE ACTIONS**

Upon the *Omnibus Motion by the Avoidance Actions Trustee to Lift Litigation Stay in Certain Avoidance Action* [DE __] (the “Motion”)² of Drivetrain, LLC (“Trustee”), in its capacity as the trustee of the Commonwealth Avoidance Actions Trust (the “Avoidance Actions Trust”); and the Court having jurisdiction over this matter under 28 U.S.C. 1331, and under section 306(a)-(b) of PROMESA, 48 U.S.C. §2166(a)-(b); and venue being proper under section 307(a) of PROMESA, 48 U.S.C. § 2167(a); and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and the Court having reviewed

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² All capitalized terms that are not otherwise defined in this Order shall have the meaning ascribed to such terms in the Motion.

the Motion and any oppositions, and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefore, it is hereby:

ORDERED:

1. The Motion is granted.
2. The stay imposed by the Procedures in the Mediated Actions listed in Appendix I and the Rosso Action listed in Appendix II of the Motion is lifted.
3. Within 21 days of this Order, the Parties shall file a joint scheduling report and proposed order that complies with the Procedures; *provided that*, such joint scheduling report and proposed order shall provide a time by which the Trustee may amend the complaint (or seek leave to amend the complaint).

Dated: [*****], 2023

Honorable Judith G. Dein
United States Magistrate Judge